



CHRISTOPHER M. BURKE

Writer's Direct Dial Number  
(619) 798-5300

Writer's Direct Email Address  
cburke@scott-scott.com

September 1, 2015

VIA ECF

Honorable Lorna G. Schofield  
U.S. District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*  
Case No. 1:13-cv-07789-LGS (S.D.N.Y.)

Dear Judge Schofield:

Pursuant to this Court's Order dated March 23, 2015 (ECF No. 274) (the "March 23 Order"), Plaintiffs write jointly with the United States Department of Justice (the "DOJ") to express their positions with respect to discovery in the above-captioned case.

Plaintiffs have conferred with the DOJ with respect to discovery in this matter. Given the pendency of the DOJ's ongoing investigation, Plaintiffs have agreed with the DOJ to request extending the existing stay set forth in the Court's March 23 Order an additional six months, until March 23, 2016. Consistent with the Court's prior Orders on the subject, the DOJ will update the Court should circumstances change and evaluate a further stay request at the time such stay is to expire.

Plaintiffs propose one modification to the March 23 Order. Plaintiffs propose to modify the March 23 Order to permit Settling Defendants to produce documents to Plaintiffs pursuant to cooperation provisions in the settlement stipulations during this six-month period.<sup>1</sup> The DOJ takes no position on this request.

Likewise, Plaintiffs have conferred with the DOJ regarding redactions in the Second Consolidated Amended Class Action Complaint ("SAC"), pursuant to the Court's Order dated

<sup>1</sup> The March 23 Order precluded "any production of documents." See ECF No. 274 at 2.

**CALIFORNIA**  
CONNECTICUT  
NEW YORK  
OHIO

SCOTT+SCOTT, ATTORNEYS AT LAW, LLP  
707 BROADWAY  
SUITE 1000  
SAN DIEGO, CA 92101

619 233-4565 VOICE  
619 233-0508 FAX  
SCOTTLAW@SCOTT-SCOTT.COM  
WWW.SCOTT-SCOTT.COM

Honorable Lorna G. Schofield  
September 1, 2015  
Page 2

July 31, 2015 (ECF No. 365). The DOJ has also requested, and Plaintiffs have agreed, that the chat transcripts and descriptions of chats included in Plaintiffs' SAC remain under seal at this time. Neither Plaintiffs nor the DOJ take any position as to whether any other material currently redacted in the SAC should remain under seal.

Very truly yours,

JEFFREY D. MARTINO  
Chief, New York Office  
Antitrust Division

By: /s/ Benjamin Sirota  
Benjamin Sirota, Trial Attorney  
Antitrust Division, New York Office  
26 Federal Plaza  
New York, NY 10278  
(212) 335-8056  
Benjamin.Sirota@usdoj.gov

*United States Department of Justice*

HAUSFELD LLP

/s/ Michael D. Hausfeld  
Michael D. Hausfeld  
1700 K Street, NW, Suite 650  
Washington, DC 20006  
Telephone: 202-540-7143  
mhausfeld@hausfeldllp.com

SCOTT+SCOTT, ATTORNEYS AT LAW, LLP

/s/ Christopher M. Burke  
Christopher M. Burke  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Telephone: 619-233-4565  
cburke@scott-scott.com

*Interim Co-Lead Class Counsel*

CMB:pm